

October 11, 2001

Kris Reinhard
Pet Rest, Inc.
1630 E. U.S. Highway 224
Ossian, Indiana 46777

Re: Registered Construction and Operation Status,
179-13977-00029

Dear Mr. Reinhard:

The application from Pet Rest, Inc., received on April 2, 2001, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.5, it has been determined that the following animal cremation plant, to be located at 11640 S. 200 E, Montpelier, Indiana, is classified as registered:

- (a) Two (2) large incinerators and twenty (20) small incinerators used for cremation of pets. Emissions from incinerators 1-1, 1-3 through 1-5, 1-9 through 1-12, and 1-17 through 1-19 are exhausted to the secondary combustion chamber identified as SC1. Emissions from incinerators 1-2, 1-6 through 1-8, 1-13 through 1-16, and 1-20 through 1-22 are exhausted to the secondary combustion chamber identified as SC2. The secondary combustion chambers SC1 and SC2 exhaust through stack S-1, which is 30 feet high and is equipped with a 7,000 cfm draw fan and a wet scrubber (identified as WS-1). Due to design limitations, only one large incinerator and ten (10) small incinerators may be operated simultaneously, making the maximum throughput capacity 550 pounds per hour. The capacity of each individual incinerator is as follows:
 - (1) Two (2) large incinerators (identified as 1-1 and 1-2) each with a maximum throughput capacity of 350 pounds per hour;
 - (2) Six (6) small incinerators (identified as 1-3 through 1-8), each with a maximum capacity of 15 pounds per hour;
 - (3) Eight (8) small incinerators (identified as 1-9 through 1-16), each with a maximum capacity of 20 pounds per hour; and
 - (4) Six (6) small incinerators (identified as 1-17 through 1-22), each with a maximum capacity of 25 pounds per hour.
- (b) Two (2) large incinerators and twenty (20) small incinerators used for cremation of pets. Emissions from incinerators 2-1, 2-3 through 2-5, 2-9 through 2-12, and 2-17 through 2-19 are exhausted to the secondary combustion chamber identified as SC3. Emissions from incinerators 2-2, 2-6 through 2-8, 2-13 through 2-16, and 2-20 through 2-22 are exhausted to the secondary combustion chamber identified as SC4. The secondary combustion chambers SC3 and SC4 exhaust through stack S-2, which is 30 feet high and is equipped with a 7,000 cfm draw fan and a wet scrubber (identified as WS-1). Due to design limitations, only one large incinerator and ten (10) small incinerators may be operated simultaneously, making the maximum throughput capacity 550 pounds per hour. The capacity of each individual incinerator is as follows:

- (1) Two (2) large incinerators (identified as 2-1 and 2-2) each with a maximum throughput capacity of 350 pounds per hour;
- (2) Six (6) small incinerators (identified as 2-3 through 2-8), each with a maximum capacity of 15 pounds per hour;
- (3) Eight (8) small incinerators (identified as 2-9 through 2-16), each with a maximum capacity of 20 pounds per hour; and
- (4) Six (6) small incinerators (identified as 2-17 through 2-22), each with a maximum capacity of 25 pounds per hour.

The following conditions shall be applicable:

- (1) Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following:
 - (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.
- (2) Pursuant to 326 IAC 4-2 (Incinerators), the incinerators shall:
 - (a) Consist of primary and secondary chambers or the equivalent;
 - (b) Be equipped with a primary burner unless burning wood products;
 - (c) Comply with 326 IAC 5-1 and 326 IAC 2;
 - (d) Be maintained properly as specified by the manufacturer and approved by the commissioner;
 - (e) Be operated according to the manufacturer's recommendations and only burn waste approved by the commissioner;
 - (f) Comply with other state and/or local rules or ordinances regarding installation and operation of incinerators;
 - (g) Be operated so that emissions of hazardous material including but not limited to viable pathogenic bacteria, dangerous chemicals or gases, or noxious odors are prevented;
 - (h) Not emit particulate matter in excess of three-tenths (0.3) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard condition corrected to fifty percent (50%) excess air; and
 - (i) Not create a nuisance or fire hazard.

If any of the above result, the burning shall be terminated immediately.

- (3) Pursuant to 326 IAC 9-1-2(3) (Carbon Monoxide Emission Limits), no person shall cause or allow the discharge of carbon monoxide from refuse incineration or burning equipment, unless the waste gas stream is burned in a direct-flame afterburner or is controlled by other means approved by the commissioner.
- (4) Pursuant to 326 IAC 2-1.1-5 (Air Quality Requirements), the Permittee shall construct stacks S-1 and S-2 such that the minimum height of each stack is 30 feet. Compliance with this stack height shall prevent the source from causing or contributing to a violation of the National Ambient Air Quality Standard (NAAQS).
- (5) During the period between 30 and 120 days after construction of the incinerators, in order to demonstrate compliance with Condition 2(h), the Permittee shall perform PM testing using methods as approved by the Commissioner. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance.
- (6) Based on a maximum throughput of 1100 pounds per hour, the potential to emit for the entire source is less than the thresholds in 326 IAC 2-5.5-1(b). Any proposed changes to the source which would either increase the maximum throughput for the entire source or increase emissions of air pollutants requires prior approval from IDEM, OAQ.

This registration is a revised registration issued to this source. The source may operate according to 326 IAC 2-5.5.

An authorized individual shall provide an annual notice to the Office of Air Quality that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.5-4(a)(3). The annual notice shall be submitted to:

**Compliance Branch
Office of Air Quality
100 North Senate Avenue
P.O. Box 6015
Indianapolis, IN 46206-6015**

no later than March 1 of each year, with the annual notice being submitted in the format attached.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Original signed by

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

ERG/AB

cc: File - Wells County
Wells County Health Department
Air Compliance - Jim Thorpe
Permit Tracking - Janet Mobley
Technical Support and Modeling - Michele Boner
Compliance Branch - Karen Nowak

| |
|---|
| Registration Annual Notification |
|---|

This form should be used to comply with the notification requirements under 326 IAC 2-5.5-4(a)(3)

| | |
|-------------------------------|----------------------------------|
| Company Name: | Pet Rest, Inc. |
| Address: | 11640 S. 200 E |
| City: | Montpelier, Indiana 47359 |
| Authorized individual: | Kris Reinhard |
| Phone #: | (219) 597-7428 |
| Registration #: | R 179-13977-00029 |

I hereby certify that Pet Rest, Inc. is still in operation and is in compliance with the requirements of Registration 179-13977-00029.

| |
|----------------------|
| Name (typed): |
| Title: |
| Signature: |
| Date: |

**NEW SOURCE CONSTRUCTION PERMIT
MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR QUALITY**

**Pet Rest, Inc.
11640 S. 200 E
Montpelier, Indiana 47359**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

| | |
|---|---------------------------------|
| Operation Permit No.: MSOP 179-13977-00029 | |
| Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality | Issuance Date: October 09, 2001 |

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates animal cremation plant.

Authorized Individual: Pet Rest, Inc.
Source Address: 11640 S. 200 E, Montpelier, Indiana 47359
Mailing Address: 1630 E. U.S. Highway 224, Ossian, Indiana 46777
Phone Number: (219) 597-7476
SIC Code: 7261
County Location: Wells
County Status: Attainment for all criteria pollutants
Source Status: Minor Source Operating Permit
Minor Source, under PSD

A.2 Emissions units and Pollution Control Equipment Summary

This stationary source is approved to construct and operate the following emissions units and pollution control devices:

- (a) Two (2) incinerators for cremation of pets identified as 1-1 and 1-2, each with a maximum capacity of 350 pounds per hour, consisting of primary, secondary and tertiary chambers, using a wet scrubber (identified as WS-1) as control, and exhausting to stack S-1. Stack S-1 is 32 feet high.
- (b) Six (6) incinerators for cremation of pets (identified as 2-1 through 2-6), each with a maximum capacity of 15 pounds per hour. Emissions from these units are controlled using a wet scrubber (identified as WS-1), which exhausts at stack S-1.
- (c) Eight (8) incinerators for cremation of pets (identified as 2-7 through 2-14), each with a maximum capacity of 20 pounds per hour. Emissions from these units are controlled using a wet scrubber (identified as WS-1), which exhausts at stack S-1.
- (d) Six (6) incinerators for cremation of pets (identified as 2-15 through 2-20), each with a maximum capacity of 25 pounds per hour. Emissions from these units are controlled using a wet scrubber (identified as WS-1), which exhausts at stack S-1.
- (e) Two (2) incinerators for cremation of pets identified as 1-3 and 1-4, each with a maximum capacity of 350 pounds per hour, consisting of primary, secondary and tertiary chambers, using a wet scrubber (identified as WS-2) as control, and exhausting to stack S-2. Stack S-2 is 32 feet high.
- (f) Six (6) incinerators for cremation of pets (identified as 3-1 through 3-6), each with a maximum capacity of 15 pounds per hour. Emissions from these units are controlled using a wet scrubber (identified as WS-2), which exhausts at stack S-2.
- (g) Eight (8) incinerators for cremation of pets (identified as 3-7 through 3-14), each with a maximum capacity of 20 pounds per hour. Emissions from these units are controlled using a wet scrubber (identified as WS-2), which exhausts at stack S-2.

- (h) Six (6) incinerators for cremation of pets (identified as 3-15 through 3-20), each with a maximum capacity of 25 pounds per hour. Emissions from these units are controlled using a wet scrubber (identified as WS-2), which exhausts at stack S-2.

SECTION B GENERAL CONSTRUCTION CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.5 Modification to Permit [326 IAC 2]

Notwithstanding the Section B condition entitled "Minor Source Operating Permit", all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.6 Minor Source Operating Permit [326 IAC 2-6.1]

This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section.
 - (1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.
 - (2) If the Affidavit of Construction does not verify that the facilities covered in this Construction Permit were constructed as proposed in the application, then the Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section prior to beginning operation of the facilities.
- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c) Upon receipt of the Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.

- (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).
- (e) Pursuant to 326 IAC 2-6.1-7, the Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date established in the validation letter. If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied. The operation permit issued shall contain as a minimum the conditions in Section C and Section D of this permit.

B.7 Permit Term [326 IAC 2-6.1-7])

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications or amendments of this permit do not affect the expiration

SECTION C

SOURCE OPERATION CONDITIONS

| |
|---------------|
| Entire Source |
|---------------|

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

- (a) The total source potential to emit of all criteria pollutants is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

C.2 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) after issuance of this permit, including the following information on each emissions unit:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.3 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

C.4 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

C.5 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.6 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.7 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

Testing Requirements

C.8 Performance Testing [326 IAC 3-6]

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Compliance Monitoring Requirements

C.9 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Record Keeping and Reporting Requirements

C.10 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality(OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon

as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.11 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.12 General Record Keeping Requirements [326 IAC 2-6.1-2]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;

- (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented when operation begins.

C.13 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

C.14 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.

- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Data Section, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Facility Description:

- (a) Two (2) incinerators for cremation of pets identified as 1-1 and 1-2, each with a maximum capacity of 350 pounds per hour, consisting of primary, secondary and tertiary chambers, using a wet scrubber (identified as WS-1) as control, and exhausting to stack S-1. Stack S-1 is 32 feet high.
- (b) Six (6) incinerators for cremation of pets (identified as 2-1 through 2-6), each with a maximum capacity of 15 pounds per hour. Emissions from these units are controlled using a wet scrubber (identified as WS-1), which exhausts at stack S-1.
- (c) Eight (8) incinerators for cremation of pets (identified as 2-7 through 2-14), each with a maximum capacity of 20 pounds per hour. Emissions from these units are controlled using a wet scrubber (identified as WS-1), which exhausts at stack S-1.
- (d) Six (6) incinerators for cremation of pets (identified as 2-15 through 2-20), each with a maximum capacity of 25 pounds per hour. Emissions from these units are controlled using a wet scrubber (identified as WS-1), which exhausts at stack S-1.
- (e) Two (2) incinerators for cremation of pets identified as 1-3 and 1-4, each with a maximum capacity of 350 pounds per hour, consisting of primary, secondary and tertiary chambers, using a wet scrubber (identified as WS-2) as control, and exhausting to stack S-2. Stack S-2 is 32 feet high.
- (f) Six (6) incinerators for cremation of pets (identified as 3-1 through 3-6), each with a maximum capacity of 15 pounds per hour. Emissions from these units are controlled using a wet scrubber (identified as WS-2), which exhausts at stack S-2.
- (g) Eight (8) incinerators for cremation of pets (identified as 3-7 through 3-14), each with a maximum capacity of 20 pounds per hour. Emissions from these units are controlled using a wet scrubber (identified as WS-2), which exhausts at stack S-2.
- (h) Six (6) incinerators for cremation of pets (identified as 3-15 through 3-20), each with a maximum capacity of 25 pounds per hour. Emissions from these units are controlled using a wet scrubber (identified as WS-2), which exhausts at stack S-2.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.1.1 Incinerators [326 IAC 4-2-2(8)]

Pursuant to 326 IAC 4-2, the incinerators shall:

- (a) Consist of primary and secondary chambers or the equivalent;
- (b) Be equipped with a primary burner unless burning wood products;
- (c) Comply with 326 IAC 5-1 and 326 IAC 2;
- (d) Be maintained properly as specified by the manufacturer and approved by the commissioner;

- (e) Be operated according to the manufacturer's recommendations and only burn waste approved by the commissioner;
- (f) Comply with other state and/or local rules or ordinances regarding installation and operation of incinerators;
- (g) Be operated so that emissions of hazardous material including but not limited to viable pathogenic bacteria, dangerous chemicals or gases, or noxious odors are prevented;
- (h) Not emit particulate matter in excess of three-tenths (0.3) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard condition corrected to fifty percent (50%) excess air; and
- (i) Not create a nuisance or fire hazard.

If any of the above result, the burning shall be terminated immediately.

D.1.2 Carbon Monoxide Emission Limits [326 IAC 9-1-2(3)]

Pursuant to 326 IAC 9-1-2(3), no person shall cause or allow the discharge of carbon monoxide from refuse incineration or burning equipment, unless the waste gas stream is burned in a direct-flame afterburner or is controlled by other means approved by the commissioner.

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 3-6]

During the period between 30 and 120 days after issuance of this permit, the Permittee shall perform PM testing using methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

| | |
|----------------------|----------------------------------|
| Company Name: | Pet Rest, Inc. |
| Address: | 11640 S 200 E |
| City: | Montpelier, Indiana 67359 |
| Phone #: | (219) 597-7476 |
| MSOP #: | 179-13977-00029 |

I hereby certify that **Pet Rest, Inc.** is ☒ still in operation.
☐ no longer in operation.

I hereby certify that **Pet Rest, Inc.** is ☒ in compliance with the requirements of MSOP 179-13977-00029.
☐ not in compliance with the requirements of MSOP 179-13977-00029.

| |
|---------------------------------------|
| Authorized Individual (typed): |
| Title: |
| Signature: |
| Date: |

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

| |
|-----------------------|
| Noncompliance: |
| |
| |
| |
| |

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-5967**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. (_____) _____

LOCATION: (CITY AND COUNTY) _____

PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO₂, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____
INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

**Please note - This form should only be used to report malfunctions
applicable to Rule 326 IAC 1-6 and to qualify for
the exemption under 326 IAC 1-6-4.**

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

October 09 , 2001

**Indiana Department of Environmental Management
Office of Air Quality**

Technical Support Document (TSD) for a Registration

Source Background and Description

Source Name: Pet Rest, Inc.
Source Location: 11640 S. 200 E, Montpelier, Indiana 47359
County: Wells
SIC Code: 7261
Operation Permit No.: 179-13977-00029
Permit Reviewer: ERG/AB

The Office of Air Quality (OAQ) has reviewed an application from Pet Rest, Inc. relating to the construction and operation of incinerators for an animal cremation plant.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) large incinerator and ten (10) small incinerators used for cremation of pets. Emissions from the incinerators are exhausted to a secondary combustion chamber (identified as SC1). The secondary combustion chamber exhausts through stack S-1, which is 30 feet high and is equipped with a 7,000 cfm draw fan and a wet scrubber (identified as WS-1). The capacity of each incinerator is as follows:
 - (1) One (1) large incinerator (identified as 1-1) with a maximum throughput capacity of 350 pounds per hour;
 - (2) Three (3) small incinerators (identified as 1-3 through 1-5), each with a maximum capacity of 15 pounds per hour;
 - (3) Four (4) small incinerators (identified as 1-9 through 1-12), each with a maximum capacity of 20 pounds per hour; and
 - (4) Three (3) small incinerators (identified as 1-17 through 1-19), each with a maximum capacity of 25 pounds per hour.
- (b) One (1) large incinerator and ten (10) small incinerators used for cremation of pets. Emissions from the incinerators are exhausted to a secondary combustion chamber (identified as SC3). The secondary combustion chamber exhausts through stack S-2, which is 30 feet high and is equipped with a 7,000 cfm draw fan and a wet scrubber (identified as WS-2). The capacity of each incinerator is as follows:
 - (1) One (1) large incinerator (identified as 2-1) with a maximum throughput capacity of 350 pounds per hour;

- (2) Three (3) small incinerators (identified as 2-3 through 2-5), each with a maximum capacity of 15 pounds per hour;
- (3) Four (4) small incinerators (identified as 2-9 through 2-12), each with a maximum capacity of 20 pounds per hour; and
- (4) Three (3) small incinerators (identified as 2-17 through 2-19), each with a maximum capacity of 25 pounds per hour.

New Emission Units and Pollution Control Equipment

The source plans to construct the following emission units and pollution control equipment.

- (a) One (1) large incinerator and ten (10) small incinerators used for cremation of pets. Emissions from the incinerators are exhausted to a secondary combustion chamber (identified as SC2). The secondary combustion chamber exhausts through stack S-1, which is 30 feet high and is equipped with a 7,000 cfm draw fan and a wet scrubber (identified as WS-1). The capacity of each incinerator is as follows:
 - (1) One (1) large incinerator (identified as 1-2) with a maximum throughput capacity of 350 pounds per hour;
 - (2) Three (3) small incinerators (identified as 1-6 through 1-8), each with a maximum capacity of 15 pounds per hour;
 - (3) Four (4) small incinerators (identified as 1-13 through 1-16), each with a maximum capacity of 20 pounds per hour; and
 - (4) Three (3) small incinerators (identified as 1-20 through 1-22), each with a maximum capacity of 25 pounds per hour.
- (b) One (1) large incinerator and ten (10) small incinerators used for cremation of pets. Emissions from the incinerators are exhausted to a secondary combustion chamber (identified as SC4). The secondary combustion chamber exhausts through stack S-2, which is 30 feet high and is equipped with a 7,000 cfm draw fan and a wet scrubber (identified as WS-2). The capacity of each incinerator is as follows:
 - (1) One (1) large incinerator (identified as 2-2) with a maximum throughput capacity of 350 pounds per hour;
 - (2) Three (3) small incinerators (identified as 2-6 through 2-8), each with a maximum capacity of 15 pounds per hour;
 - (3) Four (4) small incinerators (identified as 2-13 through 2-16), each with a maximum capacity of 20 pounds per hour; and
 - (4) Three (3) small incinerators (identified as 2-20 through 2-22), each with a maximum capacity of 25 pounds per hour.

Note: Due to design limitations, only one large incinerator and ten (10) small incinerators exhausting to each stack may be operated simultaneously, making the maximum throughput capacity for each stack equal to 550 pounds per hour. The maximum throughput capacity for the entire source is 1,100 pounds per hour.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) R 179-12659-00029, issued on January 31, 2001;

All conditions from previous approvals were incorporated into this permit.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

| Stack ID | Operation | Height (feet) | Diameter (feet) | Flow Rate (acfm) | Temperature (°F) |
|----------|-------------|---------------|-----------------|------------------|------------------|
| 1 | Incinerator | 30 | 2.5 | 5,985 | 300 |
| 2 | Incinerator | 30 | 2.5 | 5,985 | 300 |

Recommendation

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on April 2, 2001, with additional information received on April 25, 2001, June 22, 2001, July 5, 2001, August 2, 2001, August 8, 2001, and August 13, 2001.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (1 page).

Potential To Emit of Source Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

| Pollutant | Potential To Emit (tons/year) |
|-----------------|-------------------------------|
| PM | 16.9 |
| PM-10 | 16.9 |
| SO ₂ | 6.0 |
| VOC | 7.2 |
| CO | 24.1 |
| NO _x | 7.2 |

| HAP's | Potential To Emit (tons/year) |
|---------------------|-------------------------------|
| Single HAP | Negligible |
| Combination of HAPs | Negligible |

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants is less than 100 tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants is less than 25 tons per year, therefore, the source is not subject to the provisions of 326 IAC 2-6.1.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants is greater than levels listed in 326 IAC 2-1.1-3(d)(1), therefore the source is subject to the provisions of 326 IAC 2-5.5-1.
- (d) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year, therefore, the source is not subject to the provisions of 326 IAC 2-7.

Ambient Air Quality Status

OAQ, IDEM conducted modeling of the emission from the proposed plant to determine ground level concentrations for particulate matter less than 10 microns in diameter (PM₁₀). The PM₁₀ concentrations calculated using the model were added to the background levels for the region to determine whether National Ambient Air Quality Standards (NAAQS) for PM₁₀ would be exceeded. The NAAQS for this region is 50 micrograms per cubic meter for the highest annual level and 150 micrograms per cubic meter for the 24 hour average. The modeling results demonstrated that a stack height of 30 feet for stacks S-1 and S-2 would enable the source to comply with the NAAQS standards.

County Attainment Status

The source is located in Wells County.

| Pollutant | Status |
|-----------------|------------|
| PM-10 | Attainment |
| SO ₂ | Attainment |
| NO ₂ | Attainment |
| Ozone | Attainment |
| CO | Attainment |
| Lead | Attainment |

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Wells County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Wells County has been classified as attainment or unclassifiable for PM-10, SO₂, CO, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

- (c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, 40 CFR 52.21, or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD applicability.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

| Pollutant | Emissions (ton/yr) |
|-----------------|--------------------|
| PM | 16.6 |
| PM10 | 16.6 |
| SO ₂ | 6.0 |
| VOC | 7.2 |
| CO | 24.1 |
| NO _x | 7.2 |

- (a) This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.
- (b) These emissions were based on the emission calculations in Appendix A of the Technical Support Document for the Registration 179-12659-00029 issued on January 31, 2001.

Proposed Modification

PTE from the proposed modification (based on 8,760 hours of operation per year at rated capacity including enforceable emission control and production limit, where applicable):

| Pollutant | PM (ton/yr) | PM10 (ton/yr) | SO ₂ (ton/yr) | VOC (ton/yr) | CO (ton/yr) | NO _x (ton/yr) |
|-----------------------|-------------|---------------|--------------------------|--------------|-------------|--------------------------|
| Proposed Modification | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| PSD Threshold Level | 250 | 250 | 250 | 250 | 250 | 250 |

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Based on information provided by the system designer, Springer Engineering Inc., the maximum throughput capacity for each stack is 550 pounds per hour or 1100 pounds per hour for the entire source. The throughput is limited because a negative air pressure is required to provide an adequate oxygen supply to each incinerator so that complete combustion can take place. Air is pulled through the system by a 7000 cubic feet per minute fan located in each stack. For each stack, one 350 pounds per hour, three 15 pounds per hour, four 20 pounds per hour, and three 25 pounds per hour incinerators can be operated simultaneously using the 7000 cubic feet per minute fan.

The incinerators are designed to operate in the following combinations:

Stack S-1:

Either Incinerators 1-1, 1-3, 1-4, 1-5, 1-9, 1-10, 1-11, 1-12, 1-17, 1-18, and 1-19

Or Incinerators 1-2, 1-6, 1-7, 1-8, 1-13, 1-14, 1-15, 1-16, 1-20, 1-21, and 1-22

Stack S-2:

Either Incinerators 2-1, 2-3, 2-4, 2-5, 2-9, 2-10, 2-11, 2-12, 2-17, 2-18, and 2-19

Or Incinerators 2-2, 2-6, 2-7, 2-8, 2-13, 2-14, 2-15, 2-16, 2-20, 2-21, and 2-22

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit CP-179-13977-00029, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This status is based on all the air approvals issued to the source.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR 60) applicable to this source.

This source is not subject to the requirements of 40 CFR 60, Subpart E (Standards of Performance for Incinerators) because the charging rate is less than the 50 tons per day applicability threshold.

This source is not subject to the requirements of 40 CFR 60, Subpart Eb (Standards of Performance for Municipal Waste Combustors for Which Construction is Commenced After September 20, 1994, or for which Modification or Reconstruction is Commenced After June 19, 1996) because the maximum combustion capacity is less than the 250 tons of solid waste per day threshold.

This source is not subject to the requirements of 40 CFR 60, Subpart Ec (Standards of Performance for Hospital/Medical/Infectious Waste Incinerators for which Construction is Commenced After June 20, 1996) because the incinerators are pyrolysis units which are specifically exempt from the provisions of this subpart.

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is located in Wells County and the potential to emit VOC, NO_x, PM₁₀, SO₂ are less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of the incinerators will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 8-1-6 (New Facilities - General Reduction Requirement)

This source has potential VOC emissions less than twenty five (25) tons per year, therefore this source is not subject to the provisions of 326 IAC 8-1-6.

326 IAC 6-3 (Process Operations)

The incinerators are not subject to 326 IAC 6-3 because incinerators are specifically exempt from the process weight rule.

326 IAC 4-2-2(8) (Incinerators)

Pursuant to 326 IAC 4-2, the incinerators shall:

- (a) Consist of primary and secondary chambers or the equivalent;
- (b) Be equipped with a primary burner unless burning wood products;
- (c) Comply with 326 IAC 5-1 and 326 IAC 2;
- (d) Be maintained properly as specified by the manufacturer and approved by the commissioner;
- (e) Be operated according to the manufacturer's recommendations and only burn waste approved by the commissioner;
- (f) Comply with other state and/or local rules or ordinances regarding installation and operation of incinerators;
- (g) Be operated so that emissions of hazardous material including but not limited to viable pathogenic bacteria, dangerous chemicals or gases, or noxious odors are prevented;
- (h) Not emit particulate matter in excess of three-tenths (0.3) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard condition corrected to fifty percent (50%) excess air; and
- (i) Not create a nuisance or fire hazard.

If any of the above result, the burning shall be terminated immediately.

Note: The manufacturer's guaranteed particulate emission rate for the incinerators is 0.3 pounds of particulate per 1,000 pounds of dry exhaust gas, corrected to 50% excess air; therefore, the new incinerators will be in compliance with 326 IAC 4-2-2.

326 IAC 11-7(Municipal Waste Combustors)

This source is not subject to the provisions of 326 IAC 11-7 because the combustion capacity is less than the 250 tons per day applicability threshold.

326 IAC 11-6 (Hospital/Medical/Infectious Waste Incinerators)

This source is not subject to the provisions of 326 IAC 11-6 because the incinerators are pyrolysis units which are specifically exempt under 326 IAC 11-6-1(a)(5).

326 IAC 9-1-2(3) (Carbon Monoxide Emission Limits)

Pursuant to 326 IAC 9-1-2(3), no person shall cause or allow the discharge of carbon monoxide from refuse incineration or burning equipment, unless the waste gas stream is burned in a direct-flame afterburner or is controlled by other means approved by the commissioner.

Note: The waste gas stream will be burnt in a secondary chamber equipped with a secondary burner. This equipment is equivalent to a direct flame afterburner control. The source is, therefore, in compliance with 326 IAC 9-1-2(3).

Conclusion

The construction and operation of this animal cremation plant shall be subject to the conditions of the attached proposed Registration 179-13977-00029.

Appendix A: Emission Calculations Incinerators

Page 1 of 1 TSD App A

Company Name: Pet Rest, Inc.
Address City IN Zip: 11640 S 200 E, Montpelier, IN 47359
CP: 179-13977
Plt ID: 179-00029
Reviewer: ERG/AB
Date: 05/02/01

TOTAL THROUGHPUT

lbs/hr

1100

TOTAL THROUGHPUT

ton/yr

4818

| Emission Factor in lb/ton | POLLUTANT | | | | |
|--|-----------|------|------|------|------|
| | PM | SO2 | CO | VOC | NOX |
| | 7.0 | 2.5 | 10.0 | 3.0 | 3.0 |
| Potential Emissions in ton/yr Before Controls | 16.9 | 6.0 | 24.1 | 7.2 | 7.2 |
| Potential Emissions in tons/yr After Controls | 16.5 | 12.0 | 48.2 | 14.5 | 14.5 |

Methodology

Emission factors are from AP 42 (5th Edition 1/95) Table 2.1-12, Uncontrolled emission factors for industrial/commercial refuse combustors, multiple chambers

Throughput (lb/hr) * 8760 hr/yr * ton/2000 lb = throughput (ton/yr)

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no update necessary 11/98